J-U-B ENGINEERS, Inc.

N. W. Crossing Office Building, Suite 201 2810 West Clearwater Avenue

Kennewick, Washington 99336

Telephone: (509) 783-2144

June 29, 1984

Mr. Larry Peterson Washington State Dept. of Ecology E. 103 Indiana Spokane, WA 99207

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Re: Pasco Sanitary Landfill Groundwater Monitoring

Dear Mr. Peterson:

Groundwater monitoring was conducted for the sixth time in March 1984. Three additional parameters were added to the list of species analyzed over previous monitoring efforts. These three additional parameters were sodium, sulfate and total organic carbon. These parameters were measured because they would be additional indicators of potential groundwater contamination. The detailed results of the monitoring effort are provided in Attachment 1 and Attachment 2. Attachment 1 is a set of tables showing all measurements conducted over time at each of the individual monitoring well locations. Attachment 2 is the statistical analysis comparing the concentration of each of the parameters at the control well to concentrations of like parameters at down-gradient wells. The major conclusions relative to the 1984 work are as follows:

Iron is the only parameter present in concentrations in excess of the EPA maximum allowable concentrations. Average iron concentrations at the control well, well #1, #3 and #4 remain above the EPA maximum allowable concentration of 0.3 mg/l. It cannot be concluded that these iron concentrations are from the fill or waste disposal activities since iron concentrations are highest at the up-gradient control well. These concentrations are felt to be reflective of soil conditions in the area.

Iron and total dissolved solids were the only parameters found in significantly different concentrations at the down-gradient wells than at the up-gradient control well. Manganese concentrations were significantly lower at down-gradient wells #3 and #4 than manganese concentrations measured at the



control well. Again, fill activities are not considered to be responsible for any alterations in the manganese concentrations. Fill activities may be responsible for a statistically higher concentration of total dissolved solids at well #4 than at the control well. While the concentration at this location is somewhat elevated the average concentration at well #4 (482 mg/l) is below the EPA allowable maximum concentration of 500 mg/l.

The phenol concentrations measured during this sampling were markedly higher at the control well, #1 and well #2 than had been observed on the five previous surveys. Concentrations at these wells were approximately 0.5 mg/l, while previous readings were all at least an order of magnitude lower. These wells are being resampled and the samples will be reanalyzed. We will inform you of these results.

If you have any questions concerning this information, please call me at 586-6471.

Sincerely

John A. Zillich

Waste Management and

Environmental Specialist

JAZ:vl

Attachments

cc: Larry Kamberg, Benton-Franklin Health Dept. Bob Boothe, Franklin County Planner

State of Washington Department of Ecology



PRRI

RECOMMENDATION FOR ENFORCEMENT ACTION

84

Class: N/A

мемо то:	: Enforcement Officer	DATE: February 17, 198
FROM:	Lawrence N. Peterson	
	(Full Name of Investigator)	(509) 456-2926
RECOMME	END ENFORCEMENT ACTION BE TAKEN AGAINST:	(Public Telephone Number)
',	Pasco Sanitary Landfill, Inc./Attention: Mr. Larry Die	etrich
P	. O. DOX 474	
II. For:	(Address) Pasco, WA 99301	1-11
	A. Violation of Water Well Construction Act of 1971, Chapter 18.104 RCW.	(Zip Code)
-	1. Specific paragraph RCW/WAC	
	2. Failure to submit a well report for a well drilled for	
	(Name of Wellowner)	
	(Address) B. Violation of Clean Air Act. Chapter 70 CA BCW. Co. 18	
	B. Violation of Clean Air Act, Chapter 70.94 RCW. Specific paragraph RCW/W/	(Permit Number)
	- July How	
(C. Violation of Flood Control Laws, Chapter 86.16 RCW. Specific paragraph RC	CW/WAC
	D. Denial of water right application Number	The state of the s
	D. Denial of water right application Number Volume of withdrawal or diversion Proposed use	(RCW 90.03.290)
	Proposed use	
E		
F	Unlawful discharge of wastes into public waters, RCW 90.48.080.	
XX G	3. Water Quality Regulatory Notice and Order, RCW 90.48.120.	
Н.	 Noncompliance with waste discharge permit, RCW 90.48.180. (Include a copy containing the condition violated) 	of page 1 and the page of the permit
I.	of highgent discharge of oil into state waters, RCW 90.48.350	
	1. Type of oil (diesel, gasoline, fuel, bunker C, crude, etc.)	
		gallons/barrels.
J.	Modification of Water Quality Criteria, WAC 173-201-100(2).	
к.	Other	
Theres	situation	
I. The wioda	axion occurred at: (Time) Ongoing. (Da	ite)
. Location	of the incident/activity: Groundwaters of the state.	

N/A

Name of watercourse involved:





Date: February 17, 1984

RECOMMENDATION FOR TH	IFODOR

Page 2

	THE PORT OF THE PROPERTY ACTION	·,
Nam	e of Company or Individual: Pasco Sanitary	y Landfill, Inc.
VI.	Narrative of incident/situation: (Use separate	
VII.		Pictures Other
VIII.	Names and addresses:	
IX.	Recommended penalty OR regulatory action to be take	en: <u>See attached memo</u>
Enclo	Lab Report, No.	Hamilance Poteron
	Pictures	(Investigated by) L. N. Peterson
		Assistant District Supervisor (Title)
	ENDORS	SEMENT
TO:	Regional Manager	
FROM	: Division Supervisor	
We hav	e taken the following actions within the Region to resol See attached memo.	ve this problem:
<u> </u>		
Van	(E. Q. Supervisor) (Distylet Su	(District Engineer)
	,	(District Engineer)

TO:

Enforcement Officer/Assistant Director

FROM:

Regional Manager

Recommend enforcement action be taken as proposed.

(Regional Manager) (10

2/2/24 (Date)

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FOR ACTION
PERMIT ____
OTHER ____

TO:	Gail Keyes
FROM:	Lawrence Peterson
SUBJECT:	ORDER for Pasco Sanitary Landfill, Inc.
DATE:	February 17, 1984

State of washington Department of Ecology

VI.

Pasco Sanitary Landfill, Inc. operates a waste disposal operation that serves the Benton-Franklin area. The landfill serves as the commercial/residential waste disposal site for the Tri-Cities. A lagoon system provides a disposal service for septic tank haulers areawide.

The current lagoon was preceded by an adjacent lagoon (pit) that was abandoned when the bottom and walls became sealed and evaporation was insufficient to provide space for incoming wastewater. During the period 1972 through 1974, the area was a designated industrial waste disposal site. This portion of the property received thousands of tons of waste that would now be designated dangerous and/or extremely hazardous. It was handled in a "state of the art" manner at that time and the site is now classified as closed.

The existing lagoon is the subject of this enforcement request. It has been in operation for approximately five years. As with its predecessor, natural sealing has taken place and an adjacent area was excavated to provide overflow capacity. Utilization of the overflow area was hastened by abnormal volumes received during the construction boom caused by the Washington Public Power Supply System activities at Hanford. Most of the waste received was of chemical toilet origin and was characteristic of raw sewage. This was, in fact, the reason Eastern Regional Office staff became involved in the regulation of the operation. Volumes have receded and the percentage of chemical toilet wastes has lessened in the last two years. However, the facility does continue to overflow during wet periods of the year and the waste contains some untreated sewage.

The pressing problem is that wastewater applied to the primary lagoon is provided settling time and the supernatant carried over to the new pond contains few solids and there is little sealing taking place. The high percolation rate resulting from the overflow is unacceptable. There is some potential for migrating wastewater to influence the closed industrial waste site.

Action to correct this situation was initiated in late 1980. Two problems came to light during subsequent communication with the company and local health officials. First, the company was reluctant to initiate costly construction when a planned hydrogeologic study and associated water quality monitoring program might force early closure of the facility.



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TO:	Gail Keyes	- Page	2
FROM:	Lawrence Peterson	,	
SUBJECT:	ORDER for Pasco Sanitary Landfill,	Inc.	
DATE:	February 17, 1984		

State of Washington Department of Ecology

OTHER_

Second, the closure of the existing facility would cause considerable difficulty to local officials due to the absence of alternate septage disposal sites. A decision was made to allow continued use of this system, with interim operating measures in place to prevent dumping of inappropriate wastes.

The hydrogeologic report and facility analysis indicated that wastewater from the overflow pond was reaching, or could reach, groundwater. The results of an ongoing water quality monitoring program indicated little or no groundwater degradation is occurring. No impact from the industrial waste site or associated influence from the treatment facility has been detected.

It was concluded by this office that continued operation of a sealed, non-overflow lagoon posed no significant threat to groundwater. Pasco Sanitary Landfill was informed that they must submit Plans and Specifications for, and subsequently construct, an approved facility. Following submittal of the final element of a groundwater quality analysis required by this office in 1981, the company requested continued operation without upgrading the facility. This request was based on demonstrated lack of impact on groundwater.

Considerable time and effort has been expended by regional staff in explaining the provisions of RCW 90.48 peratining to this situation. Our position is clear to all concerned. There is a possibility that further effort to solicit voluntary compliance will result in delay and, perhaps, an abrupt closure of the facility. The latter would likely disrupt septic tank pumping services and cause illegal disposal problems.

The Pasco Sanitary Landfill, Inc. wastewater disposal activities do not comply with RCW 90.48.110 ("Plans and Specifications"/WAC 173-240) and RCW 90.48.010 ("Use of all known available and reasonable methods to prevent and control the pollution of waters of the State of Washington.")

IX. We recommend that an ORDER be issued pursuant to RCW 90.48.120 that requires the following:





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TO:	Gail Keyes	74 P	- Page 3
FROM:	Lawrence Peterson		
SUBJECT:	ORDER for Pasco Sanitary L	andfill,	Inc.
DATE:	February 17, 1984		



- 1. Immediate action that prevents further overflow from the primary lagoon to the overflow pond.
- 2. Submit for approval to the Eastern Regional Office not later than May 31, 1984, Plans and Specifications for an upgraded treatment facility.
- 3. Construct a treatment facility according to approved Plans and Specifications or cease all activities and submit a Closure Plan for the existing facility prior to November 1, 1984.

LNP:adw

Fances Santweller Co

RECEIVED

SEP 20 1982

DEPARTMENT OF ECOLOGY SPOKANE REGIONAL OFFICE

Mr. Lawrence D. Kamberg, R.S.
Supervisor
Environmental Health Surveillance
Section
Benton-Franklin District
Health Department
506 McKenzie
Richland, WA 99352

Re: Pasco Landfill=Conditional Use Permit

Dear Mr. Kamberg:

I am writing in response to your May 14, 1982 letter on the Pasco Sanitary Lanfill Conditional Use Permit. I am requesting the Benton-Franklin County Health Department's aproval of this conditional use permit.

The attached figure illustrates the landfill site as it currently exists. The figure illustrates the locations of the industrial waste sites and the solid waste disposal sites. Also included on the figure is the normal groundwater flow patterns as determined from groundwater elevation measurements in existing wells. Given the directional flow of the groundwater, the location of the solid waste disposal area in the north part of the site and the location of the additional new ground, I believe a groundwater monitoring well should be placed at the location indicated near the northeast corner of Section 21. Such a well will monitor any potential leachate from the existing solid waste disposal area and will also cover potential leachate from a good portion of the newly acquired ground. Once we have a well log from the new monitoring well and we couple this information with the well log from the control well and off-site well #8, we will be able to construct an excellent hydrological and geological cross sectional profile as you requested in your May 14, 1982 letter.

If this meets with your approval, please contact me by phone and I will proceed immediately with drilling. I look forward to receiving your approval of my conditional use permit.

Sincerely,

arry Dietrich

Nasco Sanitary Landfill

December 3, 1979 Mr. Larry Dietrich Resource Recovery, Inc. 420 East Ainsworth Pasco, Washington 99301 Dear Mr. Dietrich: Your plans for expanding the existing septage disposal facilities at your landfill have been forwarded to me for review by the Benton-Franklin District Health Department. We have also examined the provisions of the Health Department's approval letter and would offer the following comments: 1) We would suggest the sidewalls of the lagoon be sloped to at least 3:1 rather than 1:1. 2) A 90° elbow should be used to invert the outlet pipe in the smaller lagoon to prevent plugging with floating debris. 3) We will require you to apply for a state waste discharge permit for the entire septage operation. After receiving your application, we will meet with you and the Health Department to determine if ground water monitoring will be required to protect the shallow aquifer. Also, we will outline the record keeping requirements of the disposal operation. These may include but not necessarily be limited to, a listing of disposed materials and the quantities involved. 4) After the lagoon is in operation you should investigate the need for stabilizing the sand dikes to prevent wind and wave erosion. Should you have any questions about these comments please don't hesitate to call me at (509) 456-6198. Sincerely, Phil H. Williams District Supervisor Environmental Quality Division PHW: cac cc: Larry Kamberg, Benton-Franklin Health Department Jim Malm, Spokane DOE



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POTENTIAL PRODUCTION):																
FAVORABLE YEARS					700	1	7	50		1			l				1		
NORMAL YEARS			ļ		500	l	_	00		1			1				-1		
	INFAYORABI	<u>LE_YEARS.</u>	1		250		2	50											

FOOTNOTES

¹ POSSIBLE HAZARD OF GROUNDWATER CONTAMINATION.

QUINCY LOADS FINE SAND, O TO 15 PERCENT SLOPES. \$TITHIS VERY DEEP, SOMEWHAT EXCESSIVELY DRAINED SOIL IS ON TERRACES AND DUNES. IT FORMED IN SAND DERIVED FROM MIXED SOURCES. THE NATIVE VEGETATION IS MAINLY GRASSES AND SHRUBS. ELEVATION IS TO 1000 FEET. THE AVERAGE ANNUAL PRECIPITATION IS ABOUT 7 INCHES, THE AVERAGE ANNUAL TEMPERATURE IS ABOUT 52 DEGREES F, AND THE AVERAGE FROST-FREE SEASON IS ABOUT DAYS.

TYPICALLY, THE SURFACE LAYER IS GRAYISH BROWN LOAMY FINE SAND 4 INCHES THICK. THE UPPER PART OF THE UNDERLYING MATERIAL IS LIGHT BROWNISH GRAY LOAMY FINE SAND 46 INCHES THICK. THE LOWER PART TO A DEPTH OF 60 INCHES OR MORE IS LIGHT BROWNISH GRAY FINE SAND.

\$101Permeability of this Quincy soil is rapid. Available water capacity is low. Effective rooting depth is 60 inches or more. Runoff is slow, and the hazard of water erosion is slight. The hazard of soil blowing is high.

\$101Included in this unit is about 25 percent Hezel Loamy fine sand, Royal Loamy fine sand, Timmerman Loamy sand, Quincy fine sand, Burbank Loamy fine sand, and Quincy soils that have slopes of more than 15 percent.

\$101THIS UNIT IS USED FOR IRRIGATED CROPS, RANGELAND, IRRIGATED HAY AND PASTURE, AND HOMESITES.

\$1011F THIS UNIT IS USED FOR IRRIGATED CROPS, THE MAIN LIMITATIONS ARE STEEPNESS OF SLOPE, THE LOW AVAILABLE WATER CAPACITY, AND THE HAZARD OF SOIL BLOWING. THE MAIN IRRIGATED CROPS ARE POTATOES, CORN, SMALL GRAIN, ALFALFA, AND GRASSES.

\$101Sprinkler, drip, or trickle irrigation is suited to this unit.

Because of the low available water capacity, most crops need frequent, light applications of water. Land smoothing operations

THAT INCLUDE DEEP CUTS ARE FEASIBLE ON THIS UNIT.

\$101Using a cropping system that includes close-growing, high-residue crops in the rotation and maintaining crop residue on the surface reduce erosion. Winter cover crops also protect the soil from erosion. If maintained on the surface, residue from these crops reduces soil blowing in spring. Soil blowing is also reduced by practicing minimum tillage, which reduces pulverization of the soil.

\$101The potential plant community on this unit is mainly needleandthread, Indian ricegrass, Sandberg bluegrass, bluebunch wheaterass; and big sagebrush. The production of forage is limited by the low available water capacity. If the range is overgrazed, the proportion of preferred forage plants such as needleandthread decreases and the proportion of less preferred forage plants such as rabbitbrush and cheatgrass increases. Areas that are heavily infested with undesirable shrubs can be improved by such methods as railing, chaining, beating, and chemical treatment. Seeding on this unit generally is not practical because of the hazard of soil blowing, the low annual precipitation, and the low available water capacity.

\$101This unit is well suited to homesite development. Soil blowing can be a problem on construction sites. Cutbanks are not stable and are subject to caving in. Mulching, fertilization, and irrigation are needed to establish lawn grasses and other small plants.

\$101THE MAIN LIMITATION FOR SEPTIC TANK ABSORPTION FIELDS IS THE RISK OF SEEPAGE. IF THE DENSITY OF HOUSING IS MODERATE TO HIGH, COMMUNITY SEWAGE SYSTEMS ARE NEEDED TO PREVENT CONTAMINATION OF

NEARBY WATER SUPPLIES.

This map unit is in capability subclasses IVe, irrigated, and VIIe, nonirrigated.